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25 *The American Automobile Association, Inc.*

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 THE AMERICAN AUTOMOBILE
19 ASSOCIATION, INC.,

20 Plaintiff,

21 v.

22 AAA TOURISM, AAA CONVENTION
23 CENTER CONDOS LLC, A & A TOURISM,
24 INC., MOHAMMAD ALAM, and MARICELA
25 ALAM,

26 Defendants.

27 Civil Case No.: 2:18-cv-01644-APG-GWF

28 **STIPULATION AND PROPOSED
ORDER FOR ENLARGEMENT OF
TIME FOR DEFENDANTS TO
RESPOND TO THE COMPLAINT**

(First Request)

25 Plaintiff The American Automobile Association, Inc. ("AAA" or "Plaintiff") and
26 Defendants AAA Tourism, AAA Convention Center Condos LLC, A & A Tourism, Inc.,
27 Mohammad Alam, and Maricela Alam ("Defendants"), by and through their respective

1 attorneys of record, pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure (“FED. R.
2 CIV. P.”), and Local Rule 6-1, hereby stipulate and agree as follows:

3 1. Plaintiff commenced this action on August 29, 2018 by filing a *Complaint*
4 against Defendants for trademark infringement, false designation of origin and unfair
5 competition in violation of Sections 32 and 43(a) of the Federal Trademark Act (the “Lanham
6 Act”), 15 U.S.C. §§ 1114 and 1125(a), and Nevada common law; for cybersquatting in violation
7 of Section 43(d) of the Lanham Act, 15 U.S.C. § 1125(d); for trademark dilution in violation of
8 Section 43(c) of the Lanham Act, 15 U.S.C. § 1125(c), and Nev. Rev. Stat. § 600.435; and for
9 deceptive business practices in violation of Nev. Rev. Stat §§ 41.600 and 598.0915. (ECF No.
10 1).

11 2. The Summons and Complaint were served upon Defendant AAA Convention
12 Center Condos LLC on or about September 10, 2018. (ECF No. 12).

13 3. The deadline for Defendant AAA Convention Center Condos LLC to file its
14 answer or otherwise respond to the Complaint in accordance with FED. R. CIV. P. 12(a)(1) is
15 October 1, 2018.

16 4. Defendants’ undersigned counsel, Jeffrey J. Whitehead, Esq., accepted service of
17 the Summons and Complaint on behalf of the remaining Defendants, AAA Tourism, A & A
18 Tourism, Inc., Mohammad Alam, and Maricela Alam on or about September 14, 2018. (ECF
19 Nos. 11, 13-15).

20 5. The deadline for Defendants AAA Tourism, A & A Tourism, Inc., Mohammad
21 Alam, and Maricela Alam to file their respective answers or otherwise respond to the Complaint
22 in accordance with FED. R. CIV. P. 12(a)(1) is October 5, 2018.

23 6. The parties are currently negotiating a resolution of this matter without further
24 Court intervention; however, the parties anticipate that negotiations will not be completed prior
25 to the current deadline for Defendants to file and serve their responses to the Complaint.

26 7. WHEREFORE, the parties stipulate and agree to enlarge the time for Defendants
27 to answer or otherwise respond to the Complaint for an additional sixty (60) days to December
28 4, 2018.

1 8. This Stipulation is submitted prior to the expiration of the period provided for the
2 filing and service of Defendants' response to the Complaint (October 1, 2018), is not interposed
3 merely for delay, and is made in good faith between the parties hereto.

4 9. This is the first stipulation to enlarge the time for Defendants to answer or
5 otherwise respond to the Complaint.

6 **IT IS SO STIPULATED:**

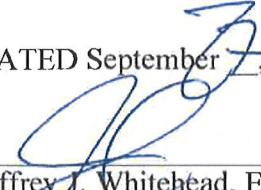
7 DATED September 27, 2018.
8 

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25 *Attorneys for Plaintiff*

26 DATED September 27, 2018.
27 

28 Jeffrey J. Whitehead, Esq.
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31 Las Vegas, Nevada 89117

32 *Attorneys for Defendants*

33 **IT IS SO ORDERED:**

34 

35 UNITED STATES MAGISTRATE JUDGE

36 DATED this 28th day of September, 2018.